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5	Attorneys for Defendant	
6	First Advantage Background Services Corp.	
7	UNITED STATES DISTRICT COURT	
8	FOR THE DISTRICT OF NEVADA	
9	JUAN MANUEL GUTIERREZ,	Case No. 2:24-cv-02288-GMN-NJK
10	Plaintiff,	DEFENDANT'S UNOPPOSED
11	V.	MOTION FOR EXTENSION OF
12	FIRST ADVANTAGE	TIME TO ANSWER OR OTHERWISE RESPOND TO
13	BACKGROUND SERVICES CORP.,	PLAINTIFF'S COMPLAINT
14	Defendant.	(First Request)
15		
16	First Advantage Background Services Corp., by its attorney and pursuant to	
17	Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 6-1, files this	
18	Unopposed Motion for Extension of Time to Answer or Otherwise Respond to	
19	Plaintiff's Complaint. As grounds for this motion, First Advantage states as	
20	follows:	
21	1. Plaintiff filed his Complaint on December 10, 2024. (Doc. 1).	
22	2. First Advantage was served with the Summons and a copy of	
23	Plaintiff's Complaint on December 9, 2024. Pursuant to Rules 8 and 12 of the	
24	Federal Rules of Civil Procedure, First Advantage's responsive pleading currently	
25	must be filed by January 8, 2025.	
26	3. First Advantage required time to find local counsel admitted to	
27	practice in the United States District Court for the District of Nevada and is filing	
28	this motion promptly after engaging local counsel	

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- 4. Additionally, First Advantage and its counsel require additional time to fully investigate and respond to Plaintiff's allegations and claims.
- 5. Accordingly, First Advantage seeks, and Plaintiff does not oppose, an extension through and including February 7, 2025, to answer or otherwise respond to Plaintiff's Complaint. See attached email exchange between lead counsel.
- 6. This request is made in good faith and will not affect any other deadlines or the just, speedy, and inexpensive determination of this action. *See* Fed R. Civ. P. 1.
- 7. This is First Advantage's first request for an extension of time in this case.

WHEREFORE, First Advantage respectfully requests that the Court grant this unopposed motion and extend First Advantage's deadline to answer or otherwise respond to Plaintiff's Complaint through and including February 7, 2025.

## HARTWELL THALACKER, LTD

## /s/Doreen Spears Hartwell

Doreen Spears Hartwell, NSB #7525 11920 Southern Highlands Pkwy #201 Las Vegas, NV 89141 Attorneys for Defendant FIRST ADVANTAGE BACKGROUND SERVICES CORP.

IT IS SO ORDERED. Dated: January 6, 2025

Nancy J. Koppe

United States Magistrate Judge